EXHIBIT A

Q. And by the early 1990s, would it be fair to call you or to characterize you as a real estate tycoon?

A. Yeah.

Q. Trump Tower on Fifth Avenue, that was

completed in 1983?
A. Around that time, yes.
Q. And when did you move into the -- your penthouse apartment there?
A. Maybe a year later.
Q. And that remained your primary residence until you were elected president; correct?
A. That's right.

Q. And Trump Tower -- where is Trump Tower located?
A. 57th and Fifth.

And at some point you became the owner of the Plaza Hotel in New York; correct?
A. Yes.
Q. And where is the Plaza Hotel located?
A. 59th off Fifth Avenue.
Q. And for how long were you the owner -- withdrawn.
During what years were you the owner of the Plaza Hotel?

A. I don't know the years. About five years.

Q. Do you know when it began? When you bought it?

A. In the early '90s.

Q. Now, in the '80s and '90s, is it fair to say you had a busy social life?

A. I don't know. I mean, I don't know what you -- you'd have to define "social life." I wouldn't say that busy. I was working very hard. So I didn't have time to be too much onto the social calendar. But yeah.

Q. Well, let me try to phrase it this way: In the evenings you went out quite a bit in New York City to benefits, galas, et cetera?

A. Lot of charity events, yes. But I don't think that much, no.

So in the period in the '80s and '90s, we've already discussed you would go to benefits and parties. And is it fair to say that at a lot of those parties, there would be a -- or benefits there would be kind of a photography line either at the beginning or throughout the event?

A. Yes.

Q. And that people would take photographs like Getty Images and then put them out?

A. Right.

D. J. TRUMP

Q. And this is another Getty Images printout, and is it fair to say that this document indicates that you were the grand marshal of the New York City Veterans Day Parade on November 10, 1995, in New York City?

A. Yes.

Similarly true that during this same period you made appearances on television; correct?

A. Yes.

Q. Sitting here today, can you recall any TV interviews that you did that you remember?

A. I did everything.

Q. When you say "everything," give me some examples if you can.

A. I did the late night shows. I did the newscasts. I even did some of the political shows on Sunday, even though I wasn't really in politics as I am now. But they wanted me to do that, and I did that. They'd ask me to do them all the time. So I did quite a bit of television.

Q. I think you already answered this question, but just so the record is clear, did you watch the program Good Morning America from time to time in this period of the late 1980s through the mid-1990s?

A. A little bit.

Q. Did you appear on the Today Show during this period?

A. Yes.

Q. Same question: Did you watch the Today Show during this period?

A. Little bit.

Q. During this period did you have any friends in the television industry who worked in the television industry?

A. Probably. But I wasn't much involved at that point in the television industry, but I probably did.

Q. Anyone come to mind right now?

A. Maybe Bob Wright.

Q. Who is Bob Wright?

A. He was the head of NBC, I think, at that time.

Q. What about Roger Ailes? When did you become friends with Roger Ailes?

A. Later.

Q. Approximately?

A. More in the seven-, eight-year-ago period.

Q. What years were you married to your first wife, Ivana Trump?

A. So about '78 to the early '90s.

D. J. TRUMP

Q. Okay. Your next wife was a woman by the name of Marla Maples?

A. Yes. Right.

Q. And sitting here today, do you recall what years you were married to Ms. Maples?

A. I'd have to get the exact dates for you. I can do that very easily.

Q. In the course of your dating life and your married life, did you have occasion to buy gifts for women you were seeing?

A. Not much actually. I mean, if it was a birthday or something, I guess, yes.

Q. And other than birthday presents, did you buy gifts for women you were dating?

THE WITNESS: I mean, it's possible, but I don't think very much, no.

BY MS. KAPLAN:

Q. I take it you bought gifts for your wives for their birthdays?

A. Yes, generally.

Q. And I take it you bought gifts for women you were dating?

A. It's -- you know, probable.

At least in your first marriage, you were seeing women outside of your marriage while you were married; correct?

THE WITNESS: I don't know.

BY MS. KAPLAN:

Q. Well, you were very public about the fact that you were seeing Ms. Maples when you were still married to Ivana Trump; no?

A. No, I don't think I was public about it.

Q. Well, there were many, many articles about it at the time; correct?

A. I don't think I was public about it. No, I don't think I was public about it at all.

Q. Isn't it true that you were seeing Ms. Maples before you were divorced from Ivana Trump?

A. I don't know. It was towards the end of the marriage. So I don't know, really. It could be a lapover, but I don't really know.

Q. Did you ever have occasion to go to the department store Bergdorf Goodman?

A. Very rarely.

Q. When you say very rarely, can you give me more detail? How rarely?

A. I mean, almost -- for me almost never. I would very rarely go there.

Q. When you went there, what do you recall shopping for?

A. I don't know. It's possible I was there, but I don't know that I ever shopped there for myself.

Q. So when you shopped there for yourself to the extent you went there, you were shopping for others?

A. I don't think I ever shopped for others. It's possible that one or both of my wives shopped there a little bit, but I don't remember ever buying something for myself at Bergdorf Goodman. I went there very seldom almost if ever.

Q. Then let's limit it to Bergdorf's.
Bergdorf's was pretty close to Trump Tower and very close to the Plaza hotel; right?
A. That's right.

Q. When did you first hear about

Ms. Carroll's allegations?

A. I think a reporter called -- I don't know who -- and said that she had written something on a book, and I said that's absolutely false. I had no idea who she was. It was a made-up story.

The reporter you're talking about, you spoke to her directly?

A. I don't know. I don't remember that. But the word got to me, and I put a statement out that that was a made-up story. It's fiction.

Q. I'm handing you a document that's been marked as DJT 18. It bears the Bates range Carroll 24378 through 24385. Do you have that in front of you?

A. Yeah.

Q. Sitting here today, do you recognize this document?

A. No.

Q. I will represent to you that this is the excerpt from Ms. Carroll's book that was published in New York Magazine online -- originally online on June 21, 2019.

A. Okay.

Q. At any point in time, did you read this article?

A. Excuse me?

Q. Did you ever read this article? This

document in front of --

A. No, I don't believe I did.

Q. I've handed you a book marked as DJT 19, a book by E. Jean Carroll. It says What Do We Need Men For, and if you look at the publication date, it says first edition July 2019. Do you have that?

A. Yes.

Q. Do you have that book in front of you?

A. Yeah.

Q. Sitting here today, sir, have you ever read this book either in its entirety or any portion of this book?

A. No, never have. I've never seen the book actually.

it was big news that Ms. Carroll had made this allegation against you; correct?

A. I'd say it was, yeah. Because that's what she wanted, to sell a book.

Q. And it was covered widely in the press;

correct?

A. I don't know about widely. I just don't know, but certainly it was a story that got out there, and it was pure fiction.

You responded publicly to Ms. Carroll's allegations on the same day that the excerpt was published in the New York Magazine, which was June 21, 2019; correct?

A. I think so.

Q. Let's take a look at that.

So what we've handed you as DJT 20 is a blown-up, for legibility purposes, version of a tweet posted by a woman by the name of Laura Littman at 5:17 p.m. on June 21, 2019. Do you have that in front of you?

A. Yes.

Q. The statement that is in this tweet, is this a statement that you gave?

A. I mean, essentially that's what I said, yeah.

If you could read that statement into the record.

Q. It says: "Statement from President Donald J. Trump. Regarding the 'story' by E. Jean Carroll claiming she once encountered me at Bergdorf Goodman 23 years ago, I've never met this person in my life. She's trying to sell a new book. That should indicate her motivation. It should be sold in the fiction section. Shame on those who make up false stories of assault, who try to get publicity for themselves or sell a book or carry out a political agenda like Julie Swetnick, who falsely accused Justice Brett Kavanaugh. It's just as bad for people to believe it, particularly when there is zero evidence. Worse still for a dying publication to try to prop itself up by pedaling fake news. It's an epidemic. Ms. Carroll in New York Magazine: No pictures, no surveillance, no videos, no reports, no sales attendants around??? I would like to thank Bergdorf Goodman for confirming they have no video footage of any such incident because it never happened. False accusations diminish the severity of real assault. All should condemn false accusations and any actual assault in the strongest possible terms. If anyone has information that the Democratic party is working with Ms. Carroll or New York Magazine, please notify us as soon as possible. The world should know what's really going on. It's a disgrace, and people should pay dearly for such false accusations." Do you see that? That's what you have in front of you?

A. Yeah.

Q. And I think you've already confirmed that this is a statement that you gave to someone on your staff to give to the press?

A. Yeah.

Q. Sitting here today, do you stand by this statement?

A. Yes.

Q. Sitting here today, are there any inaccuracies in this statement that you now know of?

A. Not that I can see, no. The only thing that I would say is -- and I've just heard this -- that she has no idea when this event took place, and somehow 23 years is mentioned, 23 years ago. It's a long time. But she has no idea supposedly when this took place, what season, what year, what month, what day. She knows nothing. And for some reason, it's put down here 23 years ago. So, you know, at one point I was told 23 years. But I've heard since she really has no clue when this took place supposedly, which -- it didn't take place.

MS. KAPLAN: Let's mark as DJT 21 a document bearing the Bates range -- hold on -- DJT 21, a document bearing the Bates range MP1795 through MP1807.

(DJT Exhibit 21 was marked for identification.)

BY MS. KAPLAN:

Q. Do you have that in front of you?

A. Yeah.

Q. And these are statements that were put out when you were the president of the United States?

A. Yeah.

Q. And if you look at the top email, the address of the email, it says under that "Remarks by President Trump before Marine One departure"?

A. Yes.

Q. Marine One is a helicopter?

A. Yes.

Q. And if you look where it shows you speaking about halfway or two-thirds of the way down the document, the very first thing you say: "So we're going to Camp David"?

A. Yes.

Q. So am I correct in interpreting this -- that this is a statement you made while boarding or getting onto Marine One --

A. Looks like it.

Q. -- to go to Camp David?

A. It looks like it.

Let's go now to the third statement, which we're going to mark as DJT 22.

(DJT Exhibit 22 was marked for identification.)

BY MS. KAPLAN:

Q. You have in front of you, sir, a five-page document. The first page says in bold type "Exclusive: Trump vehemently denies E. Jean Carroll allegation. Says she's not my type."

It's from a publication known as The Hill. It's dated June 24, 2019, and it's attributed to the gentleman Jordan Fabian and -- or maybe not the gentleman. It's attributed to two people, Jordan Fabian and Saagar Enjeti. Do you see that?

A. Yes.

Q. So this is two days after the last statement we're looking at, which is on June 22nd.

Do you recall having an interview with reporters from The Hill on June 24, 2019?

A. Vaguely, yes.

Q. And do you recall where that interview took place?

A. I think it was in the Oval Office.

Q. And you're quoted just below that paragraph as saying as follows -- and this one I'll read: "I'll say it with great respect. Number one, she's not my type. Number two, it never happened. It never happened. Okay?"

And then the reporters say: "The president said, 'Well, see you behind the Resolute Desk in the Oval Office.'" Do you see that?

A. Yes, I do.

Q. And the statement that I just read that begins "I'll state with great respect," that was a statement that you made to the reporter for The Hill on June 24, 2019; correct?

A. Yes.

Q. And the same set of questions. I take it, sir, that you stand by that statement today?

A. Yes, I do.

Sitting here today, I take it your position is you never sexually assaulted Ms. Carroll?

A. 100 percent correct.

Q. And sitting here today, I take it that you never -- that you believe you never had any sexual interaction whatsoever with Ms. Carroll?

A. I don't believe. I know. It's the most ridiculous story I've ever heard, taking her up to a department store. I have buildings all around the store. Why would I ever do that? It's the most ridiculous thing I've ever heard. It's a made-up story. It's a con job.

Q. And are you aware -- I understand that based on her -- Ms. Carroll's claim, there were two people there, you and Ms. Carroll, but sitting here today, sir, are you aware of any documents that would undermine Ms. Carroll's claim that you sexually assaulted her?

A. No documents. Just a statement: It never happened.

D. J. TRUMP

Q. And sitting here today, sir, are you aware of any witnesses who would -- I mean people who witnessed anything who would undermine the credibility of Ms. Carroll's claim that you sexually assaulted her?

THE WITNESS: The only thing I can think of is -- and I'm going to start looking -- as to whether or not any -- and the problem is she can't give us a date. Because if you could give me a date, which you can't because it never happened, I would look at security because I usually had security walk in with me. So if you could give me some kind of a date, I would be able to find out if security was around, and I could have a very nice witness. I'd love to do that. But you can't give a date because you have no idea when this supposedly took place because it didn't take place.

BY MS. KAPLAN:

Q. So your answer to my question is, no, you don't have any witnesses?

A. If you could give me a date, I could check on security because I traveled with security quite a bit, and I would have somebody from security confirm a statement that it never happened.

Q. Is it your testimony, sir, that you always walked around New York City during the period late 1995 and early 1996 with security? Is that your statement?

A. Pretty much, yes.

Q. Pretty much isn't always. Is that your testimony?

THE WITNESS: I would say pretty much to always, yeah. I always have a security person with me.

And if something like this would have happened, the store would have complained violently. It would have been a major story in the newspapers. As I take it, she said a dressing room on a -- it would be a crowded floor. Bergdorf's is a very busy store in a very prime location. I was very well-known to put it mildly. And if I was going to be walking into a dressing room with a woman -- the whole thing is so ridiculous.

So the store would have -- it would have been a major story on page 6 by Cindy Adams or Liz

Smith or by somebody within minutes; okay? So there were no complaints. There were no stories. There was no anything because it never happened. It's all fiction. It's a con job.

Q. So before you made your statements that it never happened in 2019, did you or anyone on your staff reach out to anyone at Bergdorf Goodman?

A. I didn't have to reach out to anybody because it didn't happen. And by the way, if it did happen, it would have been reported within minutes. You're talking about going to a major floor probably. I assume the most important floor, a major floor in a major department stores that's a very busy store, by the way, and checkout counters and everything else. And I would be in there? I mean, it's the most ridiculous -- it's the most ridiculous, disgusting story. It was just made up.

Q. After you made the statements that you made in June of 2019, did you or anyone working for you reach out to Bergdorf Goodman?

A. After the statement was made? No.

Q. In your June 21 statement that's marked as Exhibit 20, you say -- and this is the Littman tweet -- "I never met this person in my life."

A. Yes.

Q. Was that a true statement when you made it on June 21, 2019?

A. It was a true statement when I made it. I think subsequently or at some point they showed a picture on a receiving -- I was on a celebrity line for a charity, and I think I was either shaking her hand or her husband's hand on a receiving line. Like I say, I shake a lot of hands with people, but I had no idea who she was.

Q. So if I can understand your testimony, sir, you're saying that at the time you made the statement that's in DJT 20, you were not aware of ever having met Ms. Carroll? You have since seen a photograph that shows you with Ms. Carroll on a receiving line; correct?

A. Along with a lot of other people.

THE WITNESS: This was a very public -- I think it was a charity or a celebrity event or something. And I think that's her big claim to fame, you know, that she shook my hand at some celebrity event.

BY MS. KAPLAN:

Q. So the answer to my question is yes, that after you made the statement, you became aware that there's a photo of you with Ms. Carroll in a receiving line; correct?

A. At some point.

Q. Okay.

A. I saw there was a photo on a receiving line, yes.

Q. Okay.

MS. KAPLAN: Let's mark the photo. What number are we on?

(DJT Exhibit 23 was marked for identification.)

BY MS. KAPLAN:

Q. You have in front of you a black and white photograph that we've marked as DJT 23. And I'm going to ask you: Is this the photo that you were just referring to?

A. I think so, yes.

D. J. TRUMP

Q. And do you recall when you first saw this photo?

A. At some point during the process, I saw it. I guess that's her husband, John Johnson, who was an anchor for NBC. Nice guy, I thought. I mean, I don't know him, but I thought he was pretty good at what he did. I don't even know the woman. I don't know who -- it's Marla.

Q. You're saying Marla is in this photo?

A. That's Marla, yeah. That's my wife.

Q. Which woman are you pointing to?

MS. HABBA: No, that's Carroll.

THE WITNESS: Oh, I see.

BY MS. KAPLAN:

Q. The person you just pointed to was E. Jean Carroll.

MS. HABBA: That's your wife.

BY MS. KAPLAN:

Q. And the person -- the woman on your right was --

A. I don't know. This was the picture. I assume that's John Johnson.

MS. HABBA: That's Carroll.

THE WITNESS: That's Carroll? Because

it's very blurry.

Q. Now, in your June 21 statement, which is -- in your June 21 statement, which is DJT 20, you said that Ms. Carroll was trying to sell a new book and that you said shame on those who make up false stories of assault to try to get publicity for themselves or sell a book?

A. Yeah, that's right.

Q. Before you made that statement, did you have any knowledge one way or the other of the financial arrangements between Ms. Carroll and the publisher of her book?

A. No.

Q. Did you even know who her publisher was?

A. No.

Q. Did you ever see her book contract?

A. No.

Q. Did you know anything about Ms. Carroll's financial situation?

A. No.

Q. Did you know anything about her expected book sales?

A. No idea.

Before you made this statement that appears in DJT 20, do you know whether you or anyone working for you did any research on Ms. Carroll?

A. I just don't know. It's possible somebody -- when they heard this horrible accusation, it's possible that somebody did a little quick research but not that I know of.

Q. Another thing that you say in your June 21 statement is that Ms. Carroll was trying to carry out a political agenda?

A. Yeah.

Q. Before issuing your statement on June 21, did you learn what political party Ms. Carroll belonged to?
A. No, I didn't know that.
Q. Before you issued your June 21 statement, did you have any documents indicating that she was pursuing a political agenda?
A. No.

Q. At the end of your statement, your June 21 statement, you say: "If anyone has information that the Democratic party is working with Ms. Carroll or New York Magazine, please notify us as soon as possible."

Did anyone ever notify you --

A. I don't know.

Q. Sitting here today, you can't recall anyone who notified you?

A. I don't know, yeah.

One of the other things that you said about Ms. Carroll at the time appears in your June 24 statement, which is DJT 22, and what you said there is: "I'll say it with great respect. Number one, she's not my type."

When you said that Ms. Carroll was not your type, you meant that she was not your type physically; right?

A. I saw her in a picture. I didn't know what she looked like, and I said it -- and I say it with as much respect as I can, but she is not my type.

Q. And, again, when you say "type," you just referred to looking at photos. So you mean physically she's not your type?

A. Physically she's not my type, and now that I've gotten indirectly to hear things about her, she wouldn't be my type in any way, shape, or form.

Q. But when you were talking back on June 24th, you were referring to her not being your type physically; correct?

A. I saw a photo of her.

Q. Okay.

A. And the only difference between me and other people is I'm honest. She's not my type.

Q. I take it the three women you've married are all your type?

THE WITNESS: Yeah.

Q. Okay. And I'm just going to use categories. In addition to the people that I mentioned, do you recall any conversations with anyone in the legislative branch -- and by that I mean the House or the Senate or people who work there.

A. Well, it's probable that I told people that there was a false, disgusting lie made about me because I would say that to a lot of people. Even if they didn't ask, I was very offended by this. This woman is sick. There's something wrong with her, and it's a false story. So I would go around saying that to people, yes. So it's possible that I would say that to legislators.

Q. Okay. I take it that in the period June 21 through June 24, 2019, your instructions to anyone in the press about this issue involving E. Jean Carroll would have been consistent with your statements, which is tell people it never happened; correct?

A. It never happened.

D. J. TRUMP

Q. Ms. Grisham wrote in her book that at the meeting you said to her just deny it. That's what you do in every situation, right, Stephanie? You just deny it?

A. No. I said deny this if I said that at all, but I said it to many people. I said this never happened.

Q. Okay. Do you have --

A. And I told people -- if anybody would ask me, I said this never happened. This is a lie, and in my opinion, the woman is sick. But I didn't go into that too much. There's something wrong with this woman.

Q. Do you recall having yet a third conversation with Stephanie Grisham in the Oval Office about whether anyone would have heard -- whether if this had happened in a dressing room, someone should have heard it?

THE WITNESS: Well, I don't think so, but I have told that to many people. If a thing like this would have happened, you would have had people rushing in to find out what's going on. You mean you're raping somebody in a dressing room of a crowded department store, people right outside, and this goes on for, I assume, a period of time. And nobody would come find out what the hell is going on there? It's ridiculous.

So I do say that sometimes to people. I say can you imagine this? The concept of this? And it's me. And I -- you know, a very famous person. It's a disgrace. Frankly it's a disgrace that something like that can be brought.

Q. What is Truth Social?

A. It's a platform that's been opened by me as an alternative to Twitter.

Q. And your handle on Truth Social is

@realdonaldtrump?

A. I believe so, yes.

Q. Okay. Now, on October 12, just a few days ago, you issued a statement on Truth Social about Ms. Carroll and this case; correct?

A. I believe so, yes.

Q. And the statement that you posted, who wrote that statement?

A. I did.

Q. You yourself?

A. Yeah.

Q. Did you post the statement yourself?

A. Yes.

Q. And in addition to posting the statement on Truth Social, you also sent it to the press?

A. Yes. It's called truth and post. We post much like -- how would you say it? We put out a statement, and we also put it on Truth.

Q. Why did you decide to issue the statement on Truth Social on October 12th?

A. Because I was offended at this woman's lie. Because I was offended that she could just make up a story out of cold air, refuted by her testimony on CNN, but that she could make up a story just out of nowhere and that I get a phone call asking me about this ridiculous situation. The woman -- there's something wrong with her in my opinion. Okay. But it's a false accusation. Never happened, never would happen.

Q. Is there anything in particular that prompted you to make this statement last week?

A. Yeah. Her false story and that I have to waste a whole day doing these ridiculous questions with you.

MS. KAPLAN: Let's look at the statement. Let's mark it as -- what's my next number?

MR. MADAIO: DJT 28.

THE WITNESS: I can't read this.

MS. KAPLAN: Well, we have a blown-up version.

BY MS. KAPLAN:

Q. Let's mark it as 28 and 28A.

So what we have in front of you as DJT 28, sir, is the post as it appeared on Truth Social on October 12, 2022, and a blown-up version because we appreciate that the type is very small. A blown-up version that should be more legible.

A. I can see it, yeah.

Q. So it says: "October 12, 2022, statement by Donald J. Trump, forty-fifth President of the United States of America. This 'Ms. Bergdorf Goodman case' is a complete con job, and our legal system in this country but especially in New York State (just look at Peekaboo James) is a broken disgrace. You have to fight for years and spend a fortune in order to get your reputation back from liars, cheaters, and hacks. This decision is from the judge who was just overturned on my same case. I don't know this woman, have no idea who she is other than it seems she had a picture of me many years ago with her husband shaking my hand on a reception line at a celebrity charity event. She completely made up a story that I met her at the doors of this crowded New York City department store and within minutes 'swooned' her." "Swooned" is in quotes.

"It is a hoax and a lie just like all the other hoaxes that have been played on me for the past seven years, and while I'm not supposed to say it, I will. This woman is not my type! She has no idea what day, what week, what month, what year, or what decade this so-called 'event' supposedly took place. The reason she doesn't know is because it never happened, and she doesn't want to get caught up with details or facts that could be proven wrong. If you watch Anderson Cooper's interview with her where she was promoting a really crummy book, you will see that it is a complete scam. She changed her story from beginning to end after the commercial break to suit the purposes of CNN and Andy Cooper. Our justice system is broken along with almost everything else in our country. Her lawyer is a political operative and Cuomo crony who goes around telling people that the way to beat Trump is to sue him all over the place. She is suing me on numerous frivolous cases just like this one, and the court system does nothing to stop it.

"In the meantime and for the record, E. Jean Carroll is not telling the truth, is a woman

D. J. TRUMP

I had nothing to do with, didn't know, and would have no interest in knowing her if I ever had the chance. Now all I have to do is go through years more of legal nonsense in order to clear my name of her and her lawyer's phony attacks on me. This can only happen to 'Trump'!"

Did I read that correctly?

A. Great statement, yeah. True. True.

Q. And now that you've heard it again and you have it in front of you, you again confirm that you wrote the whole thing yourself?

A. I wrote it all myself. All myself.

Q. In this statement you say, I think, for the first time that it was a charity event, that photo. It was a charity event that --

A. That was what I was told, yeah. I was told it was a charity event. Nobody knows which event it was, but it was like a charity event.

Q. Now, at the beginning of your post, the
reference "Ms. Bergdorf Goodman" is a reference to

Ms. Carroll; right?
A. That's right.

Q. Now, when you say in here I don't know this woman and have no idea who she is, even though you're using the present tense, you're referring back to your knowledge as of when she first made the allegation --
A. I still don't know this woman. I think she's a wack job. I have no idea. I don't know anything about this woman other than what I read in stories and what I hear. I know nothing about her.
Q. Okay. Well, I guess the distinction I'm trying to make, sir, is that when the allegation came out in 2019, you said you -- I think it's your testimony that you had no idea who she was.
A. I still don't.
Q. Well, today you at least know that she's a plaintiff in a case suing you; correct?
A. Oh, yes. That, I know, but I know

nothing about her. I think she's sick, mentally sick.

Q. Okay. You say in this post -- you use a strange word, which I want to ask you about. You say she completely made up a story that I met her at the doors of this crowded New York City department store and within minutes swooned her. Do you see that?

A. Yeah.

Q. What does "swooned her" mean?

A. That would be a word, maybe accurate or not, having do with talking to her and talking her -- to do an act that she said happened, which didn't happen. And it's a nicer word than the word that starts with an F, and this would be a word that I used because I thought it would be inappropriate to use the other word. And it didn't happen.

Q. Okay. I was curious when I read this. So I looked up the word "swoon" in the dictionary, and under the dictionary, it means "to faint with extreme emotion." That's not what you meant here?

MS. HABBA: Objection to the form.

THE WITNESS: Well, sort of that's what she said I did to her. She fainted with great emotion. She actually indicated that she loved it. Okay? She loved it until commercial break. In fact, I think she said it was sexy, didn't she? She said it was very sexy to be raped. Didn't she say that?

Q. So, sir, I just want to confirm: It's your testimony that E. Jean Carroll said that she loved being sexually assaulted by you?

A. Well, based on her interview with Anderson Cooper, I believe that's what took place. And we can define that. You'll have to show that. I'm sure you're going to show that. But she was interviewed by Anderson Cooper, and I think she said that rape was sexy -- which it's not, by the way. But I think she said that rape was sexy, and it was -- she actually said things that were very strange, and then she was a different person after the -- when he said "We'll take a break right now. We're going to take a break right now," he didn't like what she was saying. He was very upset with what -- and then she came back, and she was a much different woman in the second half, so to speak.

Q. And so the question I'm asking you is did she say in that interview that she loved being sexually assaulted by you?

A. Well, she said something to that effect. I mean, you'll have to take a look at the interview yourself. I believe she said rape was sexy, to which Anderson Cooper is dying. He's saying let's get to a commercial break immediately. I think you better watch the interview. I'm sure you have, but you better watch the interview.

Q. In the interview when Ms. Carroll talked about rape being sexy, isn't it true that she said that's a view that many other people hold?

A. Oh, I don't know. I mean, I don't know. All I know is I believe she said rape is sexy or something to that effect, but you'll have to watch the interview. It's been awhile.

Q. And just to clarify, I think you said a few minutes earlier that you used the word "swooned" as a synonym for -- you said the F word -- for sexual intercourse?

A. Yeah. That's because that's what she said.

Q. What do you mean? She never used the word "swooned."

A. No. She said that I did something to her that never took place. There was no anything. I know nothing about this nut job.

Q. Okay. Then you go on to say in the statement: "And while I am not supposed to say it, I will." Why were you not supposed to say it?

A. Because it's not politically correct to say -- read the next. Go ahead. That she's not my type? Yeah. Because it's not politically correct to say it, and I know that, but I'll say it anyway. She's accusing me of rape, a woman that I have no idea who she is. It came out of the blue. She's accusing me of rape -- of raping her, the worst thing you can do, the worst charge.

And you know it's not true too. You're a political operative also. You're a disgrace. But she's accusing me and so are you of rape, and it never took place. And I will tell you I made that statement, and I said, while it's politically incorrect, she's not my type. And that's 100 percent true. She's not my type.

Q. Now, in your Truth Social statement on October 12, you use the word "hoax." Specifically you say: "It is a hoax and a lie just like all of the other hoaxes that have been played on me for the past seven years." Do you see that --

A. Yeah.

Q. -- or recall making that statement?

And I take it what you're saying there is Ms. Carroll fabricated her claim that you sexually assaulted her; correct?

A. Yes. Totally. 100 percent.

Q. Fair to say -- you'd agree with me, would you not, that you use the term "hoax" quite a lot?

A. Yes, I do.

Q. CNN reported that you used it more than 250 times in 2020. Does that sound right?

A. Could be. I've had a lot of hoaxes played on me. This is one of them.

Q. And how would you define the word "hoax"?

A. A fake story, a false story, a made-up story.

Q. Something that's not true?

A. Something that's not true, yes.

Q. Sitting here today, can you recall what else you have referred to as a hoax?

A. Sure.

THE WITNESS: The Russia Russia Russia hoax. It's been proven to be a hoax. Ukraine Ukraine Ukraine hoax. The Mueller situation for two and a half years hoax ended in no collusion. It was a whole big hoax. The lying to the FISA court hoax, the lying to Congress many times hoax by all these people, the scum that we have in our country, lying to Congress hoax, the spying on my campaign hoax. They spied on my campaign, and now they admit it. That was another hoax, and I could get a whole list of them. And this is a hoax too.

Q. This -- when you say "this" and "that" --

A. This ridiculous situation that we're doing right now. It's a big, fat hoax. She's a liar and she's a sick person in my opinion. Really sick. Something wrong with her.

Q. Okay. In addition to the Russia Russia Russia hoax, the Ukraine Ukraine Ukraine hoax, the Mueller or Mueller hoax, the lying to FISA hoax, the lying to Congress hoax, and the spying on your campaign hoax, isn't it true that you also referred to the use of mail-in ballots as a hoax?

A. Yeah, I do. Sure.

THE WITNESS: I do. I think they're very dishonest. Mail-in ballots, very dishonest.

BY MS. KAPLAN:

Q. And isn't it true that you yourself have voted by mail?

THE WITNESS: I do. I do. Sometimes I do. But I don't know what happens to it once you give it. I have no idea.

Q. Have you ever kissed a woman without her consent?

A. Well, I don't -- I can't think of any complaints. But no. I mean, I don't think so.

I think it's an inappropriate question, but I don't think so.

Q. Have you ever touched a woman on her breast or her buttocks or any other sexual part without her consent?

THE WITNESS: Well, I will tell you no, but you may have some people like your client that lie.

BY MS. KAPLAN:

Q. Have you ever pressured a woman to engage in sex with you?

A. The answer is no. But you may have some people like your client who are willing to lie.

Q. Are you familiar -- I'm sure you are -- with something that's often referred to as "the Access Hollywood tape"?

A. Yes, I am.

MS. KAPLAN: Okay. Let's mark it and play it as 35.

(DJT Exhibit 35 was marked for identification.)

(Video played.)

BY MS. KAPLAN:

Q. That's you in that video, speaking?

A. Yes, correct.

Q. And am I correct that video was recorded in January -- withdrawn.

Am I correct that that video was recorded September of 2005?

A. I guess that would -- don't know the date. But whatever date it was is fine with me.

Q. And am I correct that you were engaged to your current wife sometime in 2004?

A. I don't know.

Q. Am I correct that you married your current wife in January 2005?

A. I don't know relative to that tape, no.

Q. And the person that you were speaking to that's now famous in that video was Billy Bush?

A. That's right.

Q. Please let me --

A. This is very old news. Fully litigated during debates, during everything else. Fully litigated.

Q. Okay --

A. And you know what I said then and I say it now? Locker room talk. That was locker room talk. That's what goes on.

Q. And you did say in the video that you, quote, moved on her heavily; correct?

A. Excuse me?

Q. You do say in the video that you, quote --

A. Yeah.

Q. -- moved on her heavily?

A. I did say that, yes, absolutely.

Q. And you do say in the video that as part of trying to have sex with this woman, you took her furniture shopping; correct?

A. We actually did look for furniture, yes.

Q. So that was true? You actually took this woman Nancy furniture shopping?

A. I think so. I mean, it's been a long time ago. How long is that? Long time ago. But I think so. I do think so.

Q. Is that the only occasion when you took a woman shopping?

A. I think so.

Q. And you say -- and again, this has become very famous -- in this video, "I just start kissing them. It's like a magnet. Just kiss. I don't even wait. And when you're a star, they let you do it. You can do anything, grab them by the pussy. You can do anything."

That's what you said; correct?

A. Well, historically, that's true with stars.

Q. True with stars that they can grab women by the pussy?

A. Well, that's what -- if you look over the last million years, I guess that's been largely true. Not always, but largely true. Unfortunately or fortunately.

Q. And you consider yourself to be a star?

A. I think you can say that, yeah.

Q. And -- now, you said before, a couple of minutes ago, that this was just locker room talk?

A. It's locker room talk.

Q. And so does that mean that you didn't really mean it?

A. No. It's locker room talk. I don't know. It's just the way people talk.

Q. Okay. Now, are you familiar with a woman by the name of Natasha Stoynoff?

A. No. You'll have to give me a little bit of a background.

Q. Do you remember she wrote about you a lot when she worked at People magazine?

A. Oh, I do remember that there was some woman that wrote, and then she -- a long time later, I think, she wrote a wonderful story. And then a long time later, as I remember it

a long time later she said that I was aggressive with her, but she wrote the most beautiful story. And then all of a sudden -- like is it a year or two years later -- she comes out with this phony story that I was aggres- -- I said, Well, why would she have written such a good story for People magazine? She wrote a really nice piece.

And then all of the sudden, like, you know, years or months, many months later, she came up with this phony charge.

Q. Let's watch a video -- and again, I apologize for the technology -- where you talk about Ms. Stoynoff's allegations.

MS. HABBA: Are we marking this?

MS. KAPLAN: We're going to mark it. It's a clip of a video from a campaign event in West Palm Beach on October 13, 2016, and we'll mark it as DJT 36.

(DJT Exhibit 36 was marked for identification.)

(Video played.)

BY MS. KAPLAN:

Q. You'd agree with me that the person you were just talking about in that video was Natasha Stoynoff; correct?

A. Yes.

Q. You're familiar with a woman by the name of Jessica Leeds?

A. No, I don't think so. But explain. Go ahead.

Q. Does that mean that this refreshes your recollection of who this is?

A. Yes, it does. This woman made up a story, just like your client made it up. Just made up a story. Having to do with sitting next to me on an airplane.

And, I mean, I'll have to read this again, but that story was so false, also.

But this was, I guess, making out as opposed to what your client said. This story was so false. This is a disgrace, also.

Q. And do you recall speaking about

Ms. Leeds' allegations at campaign events in 2016?

A. I might have. I thought it was so like your client, I thought it was so ridiculous.

Q. Let's take a look at the next video, which is DJT 38.

(DJT Exhibit 38 was marked for identification.)

(Video played.)

Q. When you said in that video that Ms. Leeds would not be your first choice, you were referring to her physical looks; correct?

A. Just the overall, not -- I looked at her. I see her. I hear what she says. Whatever. You wouldn't be a choice of mine, either, to be honest with you. I hope you're not insulted. I wouldn't under any circumstances have any interest in you. I'm honest when I say it.

She, I would not have any interest in.

D. J. TRUMP

Q. But with respect to Ms. Leeds, did you know anything about what she did or what her past life was?

A. Even if you weren't suing me, I would have no interest. Okay?

And with Ms. Leeds, I watched her. I guess I saw her interview.

I mean, the whole concept of it. I'm sitting on a plane. I'm very well known. Very, very well known even then. It was a long time ago.

And all of a sudden -- and I think she said this making out with her went on for quite a while. So why didn't she leave? Why didn't she scream? Why didn't she do something?

And she wasn't able -- as I remember it -- I'm going -- I haven't read this again, because I haven't seen this in years, but I believe she said she didn't know where the plane was, where the flight was, because I don't remember ever sitting next to her. I don't think I did ever sit next to her. I think she made that up, too.

But she couldn't find tickets. She couldn't find anything. She didn't know where the flight was going. Very much like your client. She didn't know anything.

But she got publicity. And the people that saw it laughed. But I didn't laugh, because it was a charge.

And she didn't do anything, because there was nothing. She couldn't find -- she didn't know where she was going. She -- very much like this. I don't think she knew the year, the date. She didn't know anything. All she knew is that she sat next to me. I was very famous. I think it was at the time The Art of The Deal came out or something. It was a long time ago, long, long time ago.

And she sat next to me and I started making out with her. And that lasted for quite a while and then she ran. Where did she run to? She ran to another seat? It was such a phony story.

And, again, I think I had the number one book or something. It was -- you know, I was doing well.

But, no, she would -- I would not have ever done that. I don't believe she ever sat next to me. I don't believe she was on the plane. I don't believe there was a flight. And I certainly -- if she did -- which I don't believe she did -- had nothing to do with me.

Q. The video we just watched where you

talked about Ms. Leeds.

What else did you know about Ms. Leeds that would indicate to you that she was -- would not have been your first choice other than how she looked?

A. I don't know. I think I probably saw her on television or something.

But -- I don't want to be insulting, but when people accuse me of something, I think I have a right to be insulting, because they're insulting me. They're doing the ultimate insult. They make up stories and then I'm not allowed to speak my mind? No, I disagree with that.

She would not have been anywhere on a list. I just -- just wouldn't have been for me.

It's disgusting. What she said was disgusting.

Can you imagine doing that on an airplane, what she said? I'm doing that on an airplane? That's almost as ridiculous as doing it in Bergdorf Goodman in a dressing room.

Q. Isn't it true that just a few minutes ago you couldn't remember the date of your engagement to your current wife, Melania?

A. No, no. No. We're talking about a different thing. We're talking about a woman where something happened that was inappropriate; right? Inappropriate. It was highly inappropriate. She would remember that date. I would imagine she would have complained to the airlines. She would know the flight. She would know everything about it.

She didn't even know the year, as I remember it. Just like your client doesn't know the year, doesn't know anything about it.

If something happened like that to your client, your client would know the second. She'd know down to the second. She'd know the day, the month, the year, right down to the second.

Q. Sitting here today, what's the date you were married to Melania?

A. I don't want to even give you the answer. I'm not going to dignify it.

Q. In the last paragraph of the statement that you made on June 21 that appears in the Laura Littman tweet, DJT 20, you said as follows --

A. Last paragraph where?

Q. DJT 20.

A. Go ahead. What is it?

Q. You say as follows: "The world should know what's really going on. It is a disgrace, and people should pay dearly for such false accusations."

Do you see that?

A. Yeah. Yeah.

Q. And the person you meant who should pay dearly for such false accusations was E. Jean Carroll; correct?

A. Yeah, and I think their attorneys, too. I think the attorneys, like you, are a big part of it. Because you know it's a phony case.

D. J. TRUMP

Q. And the Truth Social post that we looked at recently, the point of that was also to make her pay dearly; no?

THE WITNESS: No. That's to defend my reputation. Not for anybody else. That's me. That's to defend my reputation against a false accusation.

Q. And I take it from your testimony today, sir, that that doesn't surprise you at all? That's what you wanted people to think; correct?

A. No. I just wanted people to know that I never did this. She accused me of something falsely. And if I listen to you, I should never say anything. Just never say anything. Sit back like a little wallflower and just don't do anything.

No, no. She accused me of rape, in a department store, crowded department store. And I said it didn't happen. I said it never happened. And I got sued for defamation. I got sued for defamation.

So she can accuse me of rape and I'm not supposed to say anything. No, no. That's not the way it works. She accused me, and I said it didn't happen. And I let people know it didn't happen.